IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

CAROLYN RODRIGUEZ,	§	
Plaintiff,	§ 8	
,	§	
v.	§	CIVIL ACTION NO. 4:24-00237-O
	§	
TARRANT COUNTY SHERIFFS OFFICE,	§	
et al.,	§	
	§	
Defendants.	§	

JOINT STATUS REPORT REGARDING SETTLEMENT NEGOTIATIONS

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

- 1. Plaintiff Carolyn Rodriguez, Defendant Tarrant County, Texas (referred to by Plaintiff in this action as the Tarrant County Sheriffs Office), and Defendants Larry Cox and David Ukle (collectively the "Parties") announce that they have reached an agreement in principle to settle and fully resolve Plaintiff's claims against all Defendants in this case. The parties are working on a formal settlement agreement to be executed first by Plaintiff and then by Tarrant County through a vote of the Tarrant County Commissioners Court. Because the Commissioners Court typically only meets twice each month, the parties do not anticipate being able to finalize the settlement agreement for presentment to the Tarrant County Commissioners Court until it meets in June of 2024.
- 2. Defendants have executed waivers of service of summons and have pending deadlines to answer and/or file responsive motions to Plaintiff's Complaint. ECF Nos. 4, 5. In light of the Parties' pending settlement, to avoid unnecessary expense or work on the part of the Parties and/or this Court, the Parties ask this Court to stay each Defendants' respective deadline to answer/respond to Plaintiff's Complaint and all other deadlines in this case.

3. The parties anticipate that by July 12, 2024, the settlement agreement will have been approved and the settlement funded, such that the parties will be able to file a joint stipulation of dismissal. However, the parties will promptly notify the Court of any change in this status.

Respectfully submitted,

LAW OFFICES OF CJ GRISHAM PLLC

/s/ CJ Grisham w/ permisssion

CJ GRISHAM

Texas State Bar No. 24124533 Email: cj@cjgrisham.com 3809 S. General Bruce Dr. Ste 103-101 Temple, Texas 76502 Telephone: 254-405-1726

ATTORNEY FOR PLAINTIFF **CAROLYN RODRIGUEZ**

and

/s/ Kenneth E. East w/permission

Kenneth E. East State Bar No. 00790622 Email: ken@east.law THE LAW OFFICE OF KENNETH E. EAST 306 W. 7th Street, Suite 600 Fort Worth, Texas 76102 (817) 788-1111 ATTORNEY FOR DEFENDANT **DEPUTY LARRY COX**

and

/s/ James T. Jeffrey, Jr. w/permission

JAMES T. JEFFREY, JR. State Bar No. 10612300 Email: jim.jeffrey@sbcglobal.net LAW OFFICES OF JIM JEFFREY 3200 W. Arkansas Lane Arlington, Texas 76016 (817)261-3200 (817)275-5826 FAX ATTORNEY FOR DEFENDANT

DEPUTY DAVID UKLE

and

/s/ M. Keith Ogle

M. KEITH OGLE
State Bar No. 24037207
Email: mkogle@tarrantcountytx.gov
TARRANT COUNTY DISTRICT
ATTORNEY'S OFFICE
401 W. Belknap, 9th Floor
Civil Division
Fort Worth, TX 76196
(817)884-1233
(817)884-1675 fax

ATTORNEY FOR DEFENDANT TARRANT COUNTY SHERIFFS OFFICE

CERTIFICATE OF SERVICE

The undersigned hereby asserts that no service is necessary due to the foregoing being jointly prepared and filed. However, by virtue of filing this document, a copy is being electronically served on all counsel of record.

/s/ M. Keith Ogle

M. KEITH OGLE

Assistant Criminal District Attorney